

**Exhibit A**

**Proposed Order**

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et*  
*al.*,

Debtors.<sup>1</sup>

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**This filing relates to the  
Commonwealth, ERS and HTA.**

ORDER GRANTING FOUR HUNDRED FIFTY-FIFTH OMNIBUS  
OBJECTION (NON-SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO,  
THE EMPLOYEES RETIREMENT SYSTEM OF THE GOVERNMENT OF THE  
COMMONWEALTH OF PUERTO RICO, AND THE PUERTO RICO HIGHWAYS AND  
TRANSPORTATION AUTHORITY TO SUBSEQUENTLY AMENDED  
AND SUPERSEDED CLAIMS

*Upon the Four Hundred Fifty-Fifth Omnibus Objection (Non-Substantive) of the  
Commonwealth of Puerto Rico, the Employees Retirement System of the Government of the  
Commonwealth of Puerto Rico, and the Puerto Rico Highways and Transportation Authority to  
Subsequently Amended and Superseded Claims* [ECF No. 20786] (the “Four Hundred Fifty-Fifth

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”, and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Omnibus Objection”)<sup>2</sup> filed by the Commonwealth of Puerto Rico (the “Commonwealth”), the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”), and the Puerto Rico Highways and Transportation Authority (“HTA,” and together with the Commonwealth and ERS, the “Debtors”), dated May 13, 2022, for entry of an order disallowing in their entirety certain claims filed against the Debtors, as more fully set forth in the Four Hundred Fifty-Fifth Omnibus Objection and supporting exhibits thereto; and the Court having jurisdiction to consider the Four Hundred Fifty-Fifth Omnibus Objection and to grant the relief requested therein pursuant to PROMESA section 306(a); and venue being proper pursuant to PROMESA section 307(a); and due and proper notice of the Four Hundred Fifty-Fifth Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required; and each of the claims identified in the column titled “Claims to be Disallowed” in Exhibit A to the Four Hundred Fifty-Fifth Omnibus Objection (collectively, the “Claims to Be Disallowed”) having been amended and superseded by the subsequently filed proofs of claim identified in the column titled “Remaining Amended Claims” in Exhibit A (collectively, the “Remaining Amended Claims”); and the Court having determined that the relief sought in the Four Hundred Fifty-Fifth Omnibus Objection is in the best interest of the Debtors, their creditors, and all the parties in interest; and the Court having determined that the legal and factual bases set forth in the Four Hundred Fifty-Fifth Omnibus Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the Four Hundred Fifty-Fifth Omnibus Objection is GRANTED as set forth herein; and it is further

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<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meanings given to such terms in the Four Hundred Fifty-Fifth Omnibus Objection.

ORDERED that the Claims to Be Disallowed are hereby disallowed in their entirety; and it is further

ORDERED that the Debtors' right to object to the Remaining Amended Claims is reserved; and it is further

ORDERED that Kroll is authorized and directed to designate the Claims to Be Disallowed as expunged on the official claims register in the Title III Case; and it is further

ORDERED that this Order resolves Docket Entry No. 20786 in Case No. 17-3283; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

SO ORDERED.

Dated: \_\_\_\_\_

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Honorable Judge Laura Taylor Swain  
United States District Judge

**EXHIBIT A**

**Schedule of Claims Subject to Four Hundred Fifty-Fifth Omnibus Objection**

## Four Hundred Fifty-Fifth Omnibus Objection

## Exhibit A - Claims to Be Disallowed

CLAIMS TO BE DISALLOWEDREMAINING AMENDED CLAIMS

|   | NAME   | DATE<br>FILED | CASE NUMBER /<br>DEBTOR  | CLAIM # | CLAIM<br>AMOUNT | NAME   | DATE<br>FILED | CASE NUMBER /<br>DEBTOR  | CLAIM # | CLAIM<br>AMOUNT |
|---|--|---------------|--|---------|-----------------|--|---------------|--|---------|-----------------|
| 1   | GARCIA LOPERENA,<br>ELISA M.<br>CALLE LOS<br>LOPTRONA #96<br>MOCA, PR 00676-5023 | 06/29/18      | 17 BK 03566-LTS<br>Employees Retirement<br>System of the Government<br>of the Commonwealth of<br>Puerto Rico | 147310  | \$16,530.00*    | GARCIA LOPERENA,<br>ELISA M.<br>CALLE LOS<br>LOPERENA #96<br>MOCA, PR 00676-5023 | 06/30/18      | 17 BK 03566-LTS<br>Employees Retirement<br>System of the Government<br>of the Commonwealth of<br>Puerto Rico | 40272   | \$16,530.34*    |
| Reason: Amended and superseded by a later filed Proof of Claim. |  |               |  |         |                 |  |               |  |         |                 |
| 2   | GONZALEZ LLANES,<br>CARMEN L.<br>P.O. BOX 9048<br>ARECIBO, PR 00613              | 07/06/18      | 17 BK 03283-LTS<br>Commonwealth of Puerto<br>Rico  | 160314  | Undetermined*   | GONZALEZ LLANES,<br>CARMEN L.<br>P.O. BOX 9048<br>ARECIBO, PR 00613              | 09/16/18      | 17 BK 03566-LTS<br>Employees Retirement<br>System of the Government<br>of the Commonwealth of<br>Puerto Rico | 167214  | \$20,000.00     |
| Reason: Amended and superseded by a later filed Proof of Claim. |  |               |  |         |                 |  |               |  |         |                 |
| 3   | MARTINEZ<br>VALENTIN, LUIS G<br>BOX 859<br>SALINAS, PR 00751                     | 06/29/18      | 17 BK 03283-LTS<br>Commonwealth of Puerto<br>Rico  | 148059  | \$41,000.00     | MARTINEZ VALENTIN,<br>LUIS GUILLERMO<br>BOX 859<br>SALINAS, PR 00751             | 07/18/19      | 17 BK 03283-LTS<br>Commonwealth of Puerto<br>Rico  | 169805  | Undetermined*   |
| Reason: Amended and superseded by a later filed Proof of Claim. |  |               |  |         |                 |  |               |  |         |                 |
| 4   | MERCADO GALINDO,<br>MOISES M<br>BOX 1583<br>SAN GERMAN, PR<br>00683              | 06/08/18      | 17 BK 03566-LTS<br>Employees Retirement<br>System of the Government<br>of the Commonwealth of<br>Puerto Rico | 55236   | \$16,800.00*    | MERCADO GALINDO,<br>MOISES M<br>BOX 1583<br>SAN GERMAN, PR<br>00683              | 09/27/18      | 17 BK 03283-LTS<br>Commonwealth of Puerto<br>Rico  | 167520  | Undetermined*   |
| Reason: Amended and superseded by a later filed Proof of Claim. |  |               |  |         |                 |  |               |  |         |                 |
| 5   | NOBLE TORRES,<br>IVONNE<br>PO BOX 593<br>JUNCOS, PR 00777                        | 06/29/18      | 17 BK 03283-LTS<br>Commonwealth of Puerto<br>Rico  | 144662  | Undetermined*   | TORRES, IVONNE<br>NOBLE<br>P.O. BOX 593<br>JUNCOS, PR 00777                      | 06/22/20      | 17 BK 03283-LTS<br>Commonwealth of Puerto<br>Rico  | 174171  | \$35,408.00     |
| Reason: Amended and superseded by a later filed Proof of Claim. |  |               |  |         |                 |  |               |  |         |                 |

## Four Hundred Fifty-Fifth Omnibus Objection

## Exhibit A - Claims to Be Disallowed

CLAIMS TO BE DISALLOWEDREMAINING AMENDED CLAIMS

|   | NAME   | DATE<br>FILED | CASE NUMBER /<br>DEBTOR   | CLAIM # | CLAIM<br>AMOUNT  | NAME  | DATE<br>FILED | CASE NUMBER /<br>DEBTOR   | CLAIM # | CLAIM<br>AMOUNT  |
|---|--|---------------|---|---------|------------------|---|---------------|---|---------|------------------|
| 6   | NOBLE TORRES,<br>IVONNE<br>PO BOX 593<br>JUNCOS, PR 00777  | 06/29/18      | 17 BK 03283-LTS<br>Commonwealth of Puerto<br>Rico                       | 159494  | Undetermined*    | TORRES, IVONNE<br>NOBLE<br>P.O. BOX 593<br>JUNCOS, PR 00777   | 06/22/20      | 17 BK 03283-LTS<br>Commonwealth of Puerto<br>Rico                       | 174171  | \$35,408.00      |
| Reason: Amended and superseded by a later filed Proof of Claim. |  |               |   |         |                  |   |               |   |         |                  |
| 7   | RIVERA-COLON,<br>NESTOR<br>BUFETE FRANCISCO<br>R. GONZALEZ<br>1519 PONCE DE LEON<br>AVE<br>SUITE 805<br>SAN JUAN, PR 00909 | 06/29/18      | 17 BK 03567-LTS<br>Puerto Rico Highways and<br>Transportation Authority | 101354  | \$16,800,000.00* | RIVERA COLON,<br>NESTOR<br>FRG LAW<br>BUFETE FRANCISCO<br>R. GONZALEZ<br>1519 PONCE DE LEON<br>AVE. SUITE 805<br>SAN JUAN, PR 00909 | 04/04/22      | 17 BK 03567-LTS<br>Puerto Rico Highways and<br>Transportation Authority | 179755  | \$16,800,000.00* |
| Reason: Amended and superseded by a later filed Proof of Claim. |  |               |   |         |                  |   |               |   |         |                  |